

United States District Court  
for the  
Southern District of New York  
Related Case Statement

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Full Caption of Later Filed Case:

Jane Doe 1, individually and on behalf of  
all others similarly situated,

Plaintiff

Case Number

vs.

Deutsche Bank Aktiengesellschaft,  
Deutsche Bank AG New York Branch and  
Deutsche Bank Trust Company Americas,

Defendant

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)

Ali Karimi, Individually and on Behalf of All  
Others Similarly Situated,

Plaintiff

Case Number

vs.

1:22-cv-02854-JSR

Deutsche Bank Aktiengesellschaft, John  
Cryan and Christian Sewing

Defendant

## Status of Earlier Filed Case:

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Closed

(If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.)

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Open

(If so, set forth procedural status and summarize any court rulings.)

Case No. 1:22-cv-02854-JSR (Karimi) is pending before this court. On 07/15/2020, plaintiffs filed a class action suit in response to the NY State Div of Financial Services' finding that Deutsche Bank violated banking laws during its relationship with Jeffrey Epstein and his related entities. On 06/13/2022, the court denied the Bank and CEO's Motion to Dismiss and dismissed two chief financial officers. On 10/20/2022 the court issued its Order Preliminarily Approving Settlement and Providing for Notice which certified a class for settlement purposes, preliminarily approved the settlement, and approved the notice, claim form, summary notice and postcards. The court set a hearing for 01/31/2023, and stayed the proceedings other than those necessary to carry out the settlement stipulation. On 11/01/2022, a 28 U.S.C. § 1715 Declaration was filed.

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

The earlier-filed and newly filed cases are both brought against the same defendant, Deutsche Bank Aktiengesellschaft ("Deutsche Bank"). Both cases concern Deutsche Bank's role in the Jeffrey Epstein sex-trafficking enterprise. The cases have substantial factual and legal overlap. A number of the allegations in the complaint in the newly filed case are substantively identical to allegations in the complaint in the earlier filed case. In both cases, the plaintiffs allege that Deutsche Bank's onboarding of Epstein and business relationship with Epstein and Epstein related entities violated the Bank's Know Your Client (KYC) and Anti-Money Laundering (AML) systems and federal and New York State banking regulations. The Karimi plaintiffs allege that the Bank ignored damaging information when it onboarded Epstein and throughout its relationship with Epstein and Epstein related entities and that the Bank failed to protect its stockholders. Karimi plaintiffs claim that the Bank's violations adversely affected stockholder's investments. The newly filed action is brought by victims of Epstein's sex trafficking operation and allege that the Bank provided the financial services critical to the sex-trafficking's daily operation and that Epstein could not have perpetrated his crimes without the bank's knowing participation and support. Both cases involve the same witnesses, current and former bank employees and executives, who purposely ignored Epstein's crimes and violated Bank procedures and banking laws in the pursuit of profit. Both cases involve the same proof regarding the Bank's KYC and AML procedures and how Bank employees and executives ignored those procedures and put stockholders and victims at risk. Both cases allege that the Bank's executives and management boards routinely overruled compliance staff so that the Bank's wealth management business could commence and continue its relationship with Epstein. Plaintiffs in the earlier-filed case allege that when the Bank's relationship with Epstein was revealed, the Bank's stock lost value and harmed stockholders. Plaintiffs in the newly filed case allege that the Bank management's violations of Bank procedures and banking laws harmed them by allowing the sex-trafficking operation to flourish and Epstein and his co-conspirators to victimize more and more women and young girls. Both harms are proved with the same evidence. While the harm to each class was different, the Bank's violations of both its internal KYC and AML procedures and federal and state banking laws placed both classes of plaintiffs at risk.

Signature: /s/ Bradley J. Edwards Date: 11/24/2022

Edwards Pottinger LLC

Firm: \_\_\_\_\_